further, since the HCPM is not complete, a more detailed analysis would have been premature. Nonetheless, these deviations and others underscore the potential inaccuracy of the models, especially for providing cost estimates for smaller areas.

These variations, like the others described above, remind us that engineering judgment regarding assumed inputs and algorithms figures prominently into the results. Given how different the results are, I believe regulators should seriously question whether it is appropriate to base pricing decisions on any proxy model because doing so could force the ILECs and others to set their prices based not on their actual forward looking costs, but on costs produced by models that do not reflect sound engineering design.

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not resolve from the documentation provided. Furthermore, this implies that it will be difficult to try to fully integrate the models with each other, if they in fact use similar terms on different ways or handle the same inputs in different fashions. Finally, it emphasizes how important it is to use accurate input values.

Harold Ware

Harold Ware

Subscribed and sworn before me this 25th day of November 1997.

Rita Satenstein

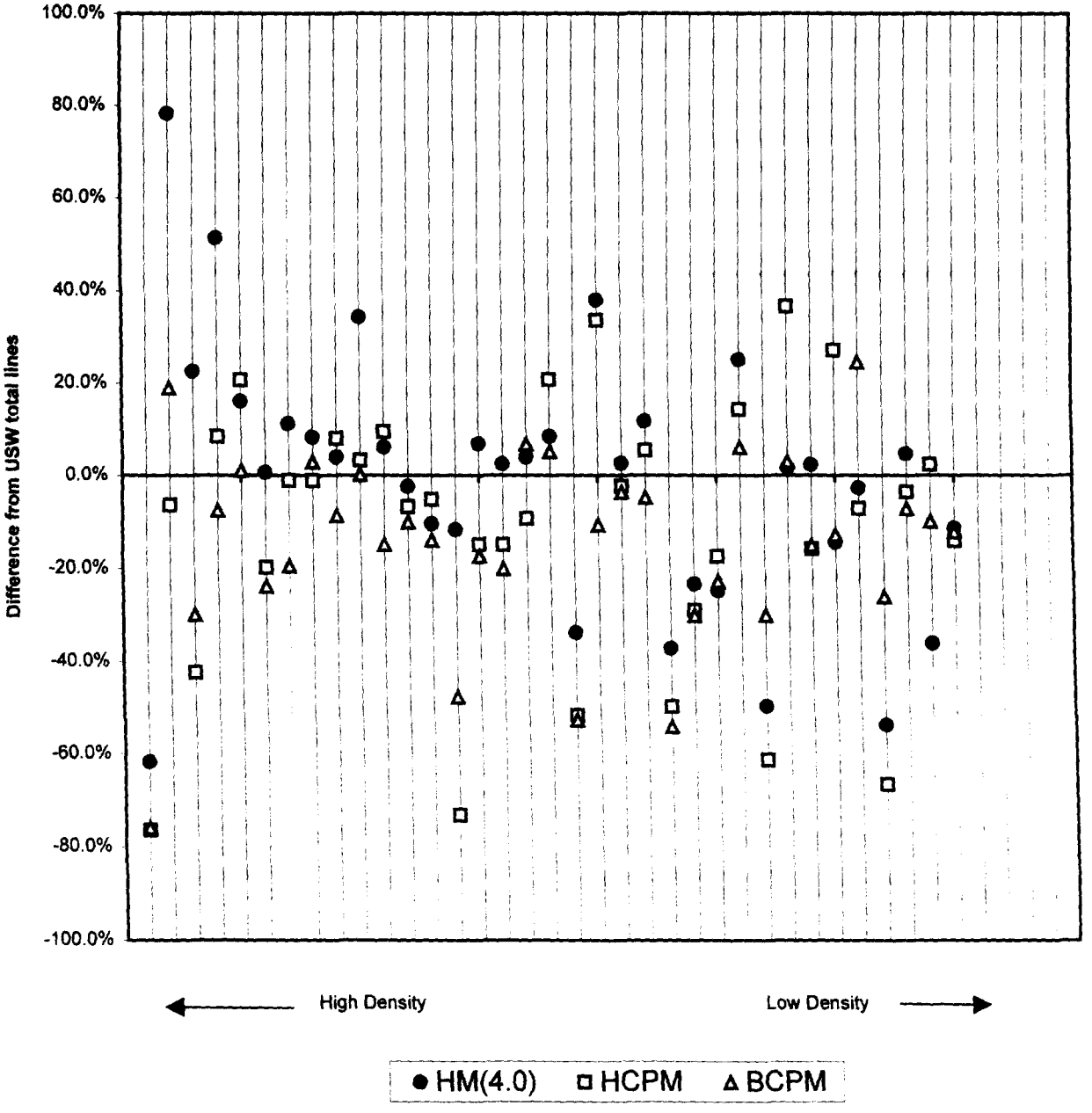
Notary Public

My commission expires: 8/15/98

RITA SATENSTEIN
Notary Public, State of New York
No. 4838855
Qualified in Westchester County
Commission Expires 8/15/98

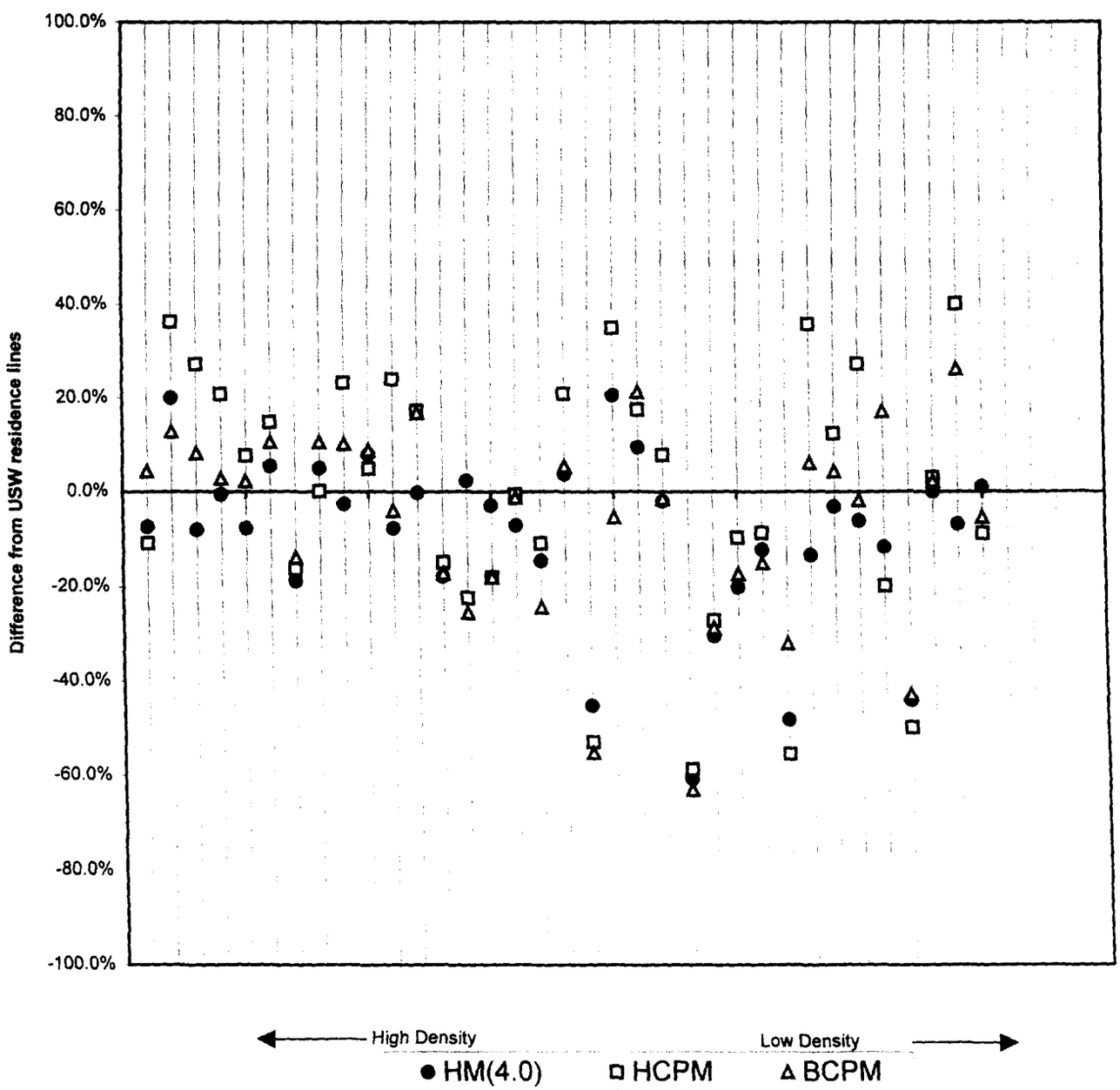
Attachment 1
Figure 1

Percent Difference from USWest Total Line Count by Wire Center



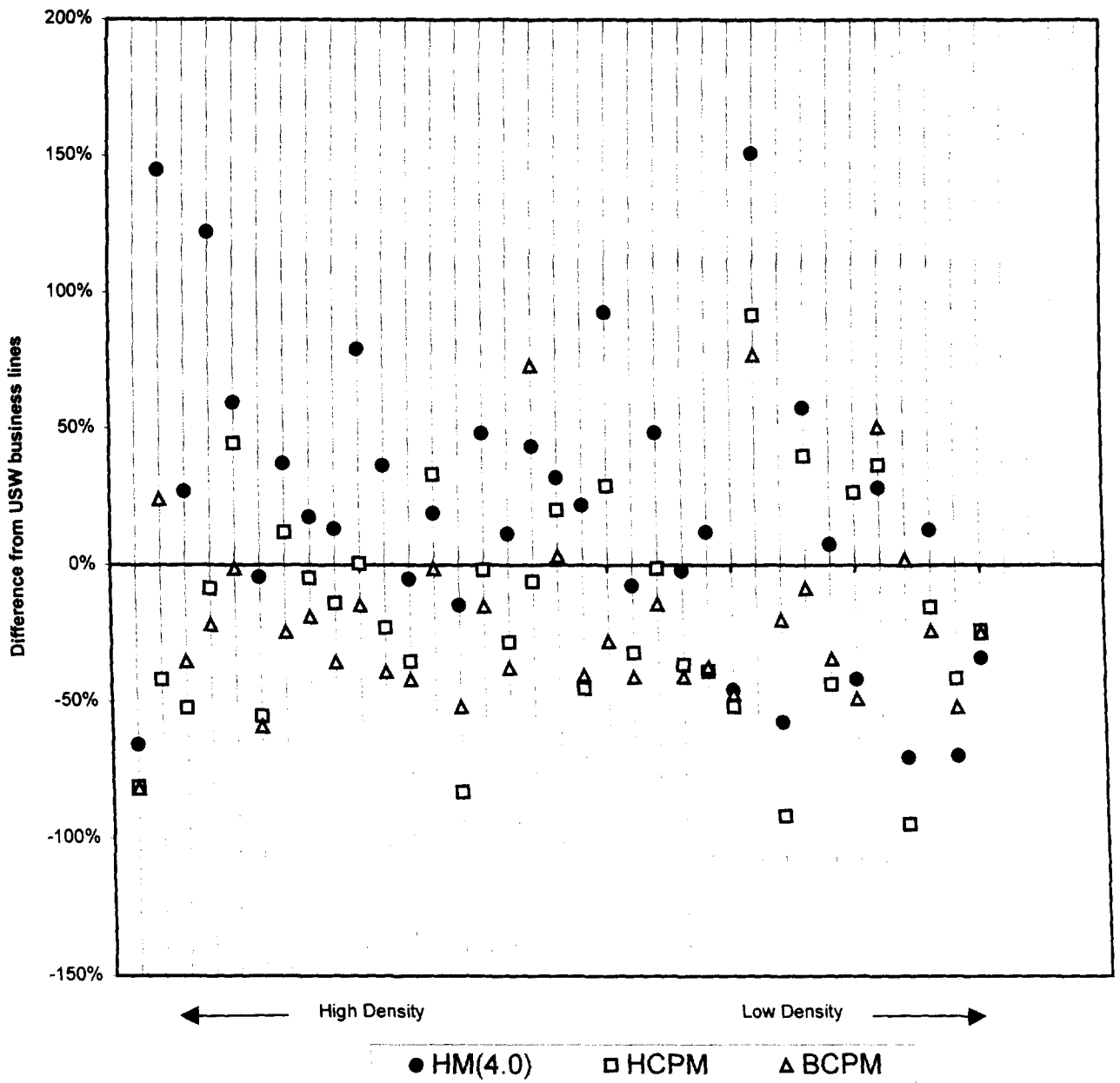
Attachment 1
Figure 2

Percent Difference from USWest Residence Line Count by Wire Center



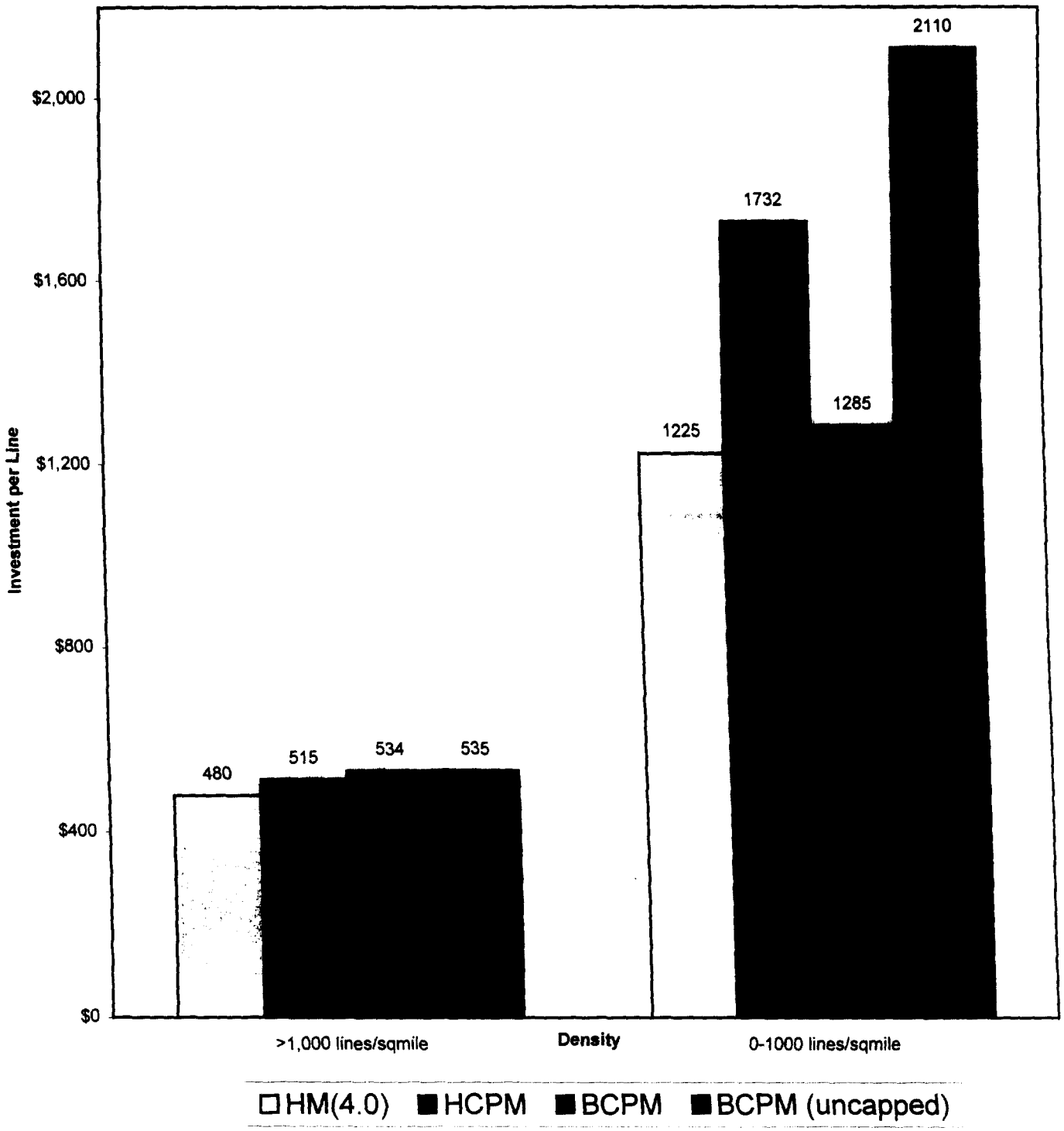
Attachment 1
Figure 3

Percent Difference from USWest Business Line Count by Wire Center



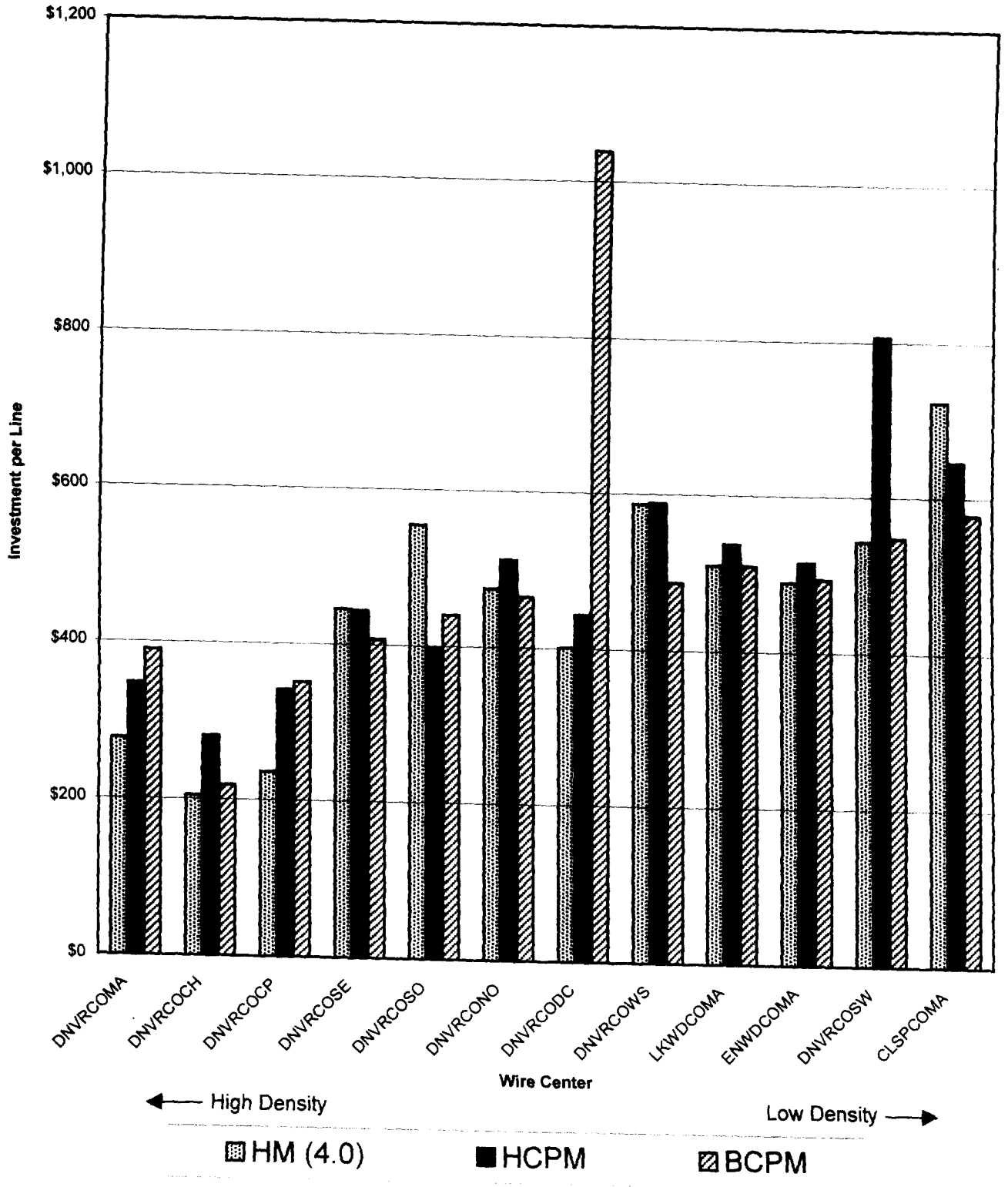
Attachment 1
Figure 4

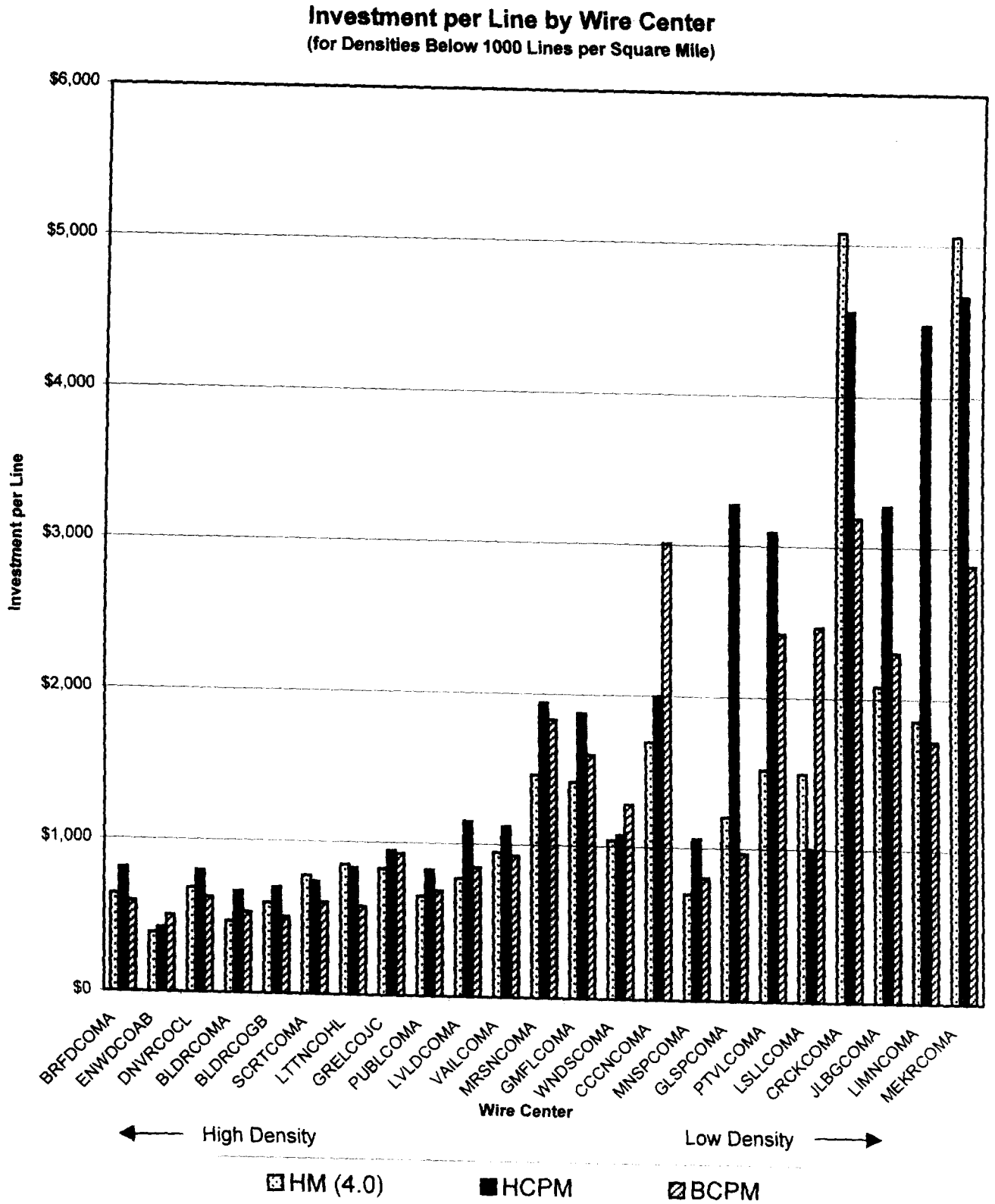
Weighted Average Loop Investment Per Line by Density Group



Investment Per Line by Wire Center

(for Densities Above 1,000 Lines per Square Mile)




Investment per Line by Wire Center
(for Densities Below 1000 Lines per Square Mile)
$6,000
$5,000
$4,000
$3,000
$2,000
$1,000
$0
Investment per Line
BRFDCOMA
ENWDCOAB
DNVRCOCL
BLDRCOMA
BLDRCOGB
SCRTCOMA
LTTNCOHL
GRELCOJC
PUBLCOMA
LVLDCOMA
VAILCOMA
MRSNCOMA
GMFLCOMA
WNDSCOMA
CCCNCOMA
MNSPCOMA
GLSPCOMA
PTVLCOMA
LSLLCOMA
CRCKCOMA
JLBGCOMA
LIMNCOMA
MEKRCOMA
Wire Center
High Density
Low Density
HM (4.0)
HCPM
BCPM

Cost Proxy Models

Comparison of Line Counts
for selected Wire Centers in COLORADO

WC	US West	HCPM	BCPM 2.5	HM 4.0
AGLRCOMA	*510*	489	500	101
BLDRCOMA	*79,006*	67,182	63,156	80,969
CLHNCOMA	*984*	1,512	879	1,420
CRDLCOMA	*6,812*	6,078	5,392	8,093
DNVRCOEA	*89,112*	75,618	89,440	126,236
EATNCOMA	*2,372*	1,894	1,879	2,234
FRSCCOMA	*4,344*	2,753	1,235	42
GRTWCOMA	*1,558*	1,543	955	462
KIOWCOMA	*924*	686	647	672
LTTNCOHL	*23,878*	11,555	11,303	15,822
NDLDCOMA	*2,341*	1,622	1,488	1,345
PTVLCOMA	*1,353*	1,720	1,179	1,158
STNGCOMA	*10,552*	10,369	10,117	10,953
WDPKCOMA	*7,959*	6,162	7,787	8,230

Notes

US West numbers based on Data Request "USWC: Att: 1" filed with FCC.
HCPM numbers are result of FCC's Feeddist program, run 11/10-13/97.
BCPM 2.5 numbers are based on the version released on CD at the 11/6/97 workshop in Boston (where applicable capped numbers are used).
HM 4.0 numbers are based on the model's default inputs.

Numbers in *italics* are calculated based on the other numbers for the Wire Center (HM Total Investment is Investment/# lines)

Cost Proxy Models

Comparison of Total (Loop) Investment/Line
for selected Wire Centers in COLORADO

WC	HCPM	BCPM 2.5		HM 4.0
		Uncapped	Capped	
AGLRCOMA	$2,409	$9,900	$3,687	*$26,072*
BLDRCOMA	$666	$534	$528	*$468*
CLHNCOMA	$8,699	$8,634	$5,056	*$3,336*
CRDLCOMA	$1,840	$2,267	$1,716	*$1,625*
DNVRCOEA	$459	$480	$480	*$500*
EATNCOMA	$1,585	$1,572	$1,555	*$1,993*
FRSCCOMA	$541	$1,167	$839	*$1,867*
GRTWCOMA	$3,340	$4,754	$2,946	*$3,597*
KIOWCOMA	$9,264	$14,009	$5,858	*$4,317*
LTTNCOHL	$832	$577	$577	*$851*
NDLDCOMA	$2,925	$4,387	$3,438	*$2,045*
PTVLCOMA	$3,091	$2,903	$2,421	*$1,522*
STNGCOMA	$3,744	$2,671	$1,732	*$1,256*
WDPKCOMA	$2,579	$2,223	$1,948	*$1,531*

Notes

US West numbers based on Data Request "USWC: Att: 1" filed with FCC.
HCPM numbers are result of FCC's Feeddist program, run 11/10-13/97.
BCPM 2.5 numbers are based on the version released on CD at the 11/6/97 workshop in Boston.

HM 4.0 numbers are based on the model's default inputs.
Total Investment/Line is based on the total investment produced by the NERA provided Total (Loop) Investment calculation divided by total number of lines.

*Total Loop Invest/Ln represents the Total Investment reported by HCPM, the Loop Investment per Line from the BCPM models, and the total investment produced by the NERA provided total (loop) investment calculation divided by the total number of lines reported in HM. We assume the other models are reporting uncapped amounts.

Numbers in italics are calculated based on the other model provided numbers for the Wire Center.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of November, 1997 a copy of the foregoing "Comments of Bell Atlantic on Hybrid Cost Proxy Model" was served by hand on the parties on the attached list.

Tracey M. DeVaux

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